22-11730-mg Doc 44-3 Filed 05/09/23 Entered 05/09/23 11:34:21 Exhibit C - January 19 2023 Letter from Trustee Pg 1 of 3

Exhibit C



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January 19, 2023

VIA EMAIL (adrienne@woodslawpc.com)

Adrienne Woods, Esq. The Law Offices of Adrienne Woods, P.C. 105 West 86th Street, #314 New York, NY 10024

Madhu Grover, Debtor; Case No. 22-11730-mg Re:

Dear Ms. Woods,

I am the chapter 7 trustee of the bankruptcy estate of your client, Madhu Grover (the "Debtor"). Please instruct the Debtor that all of her pre-petition property must be immediately secured and that no property may be dissipated, transferred, liquidated, or otherwise disposed of absent written instruction from me. The Debtor will be held personally responsible for any dissipation of any estate assets.

This letter shall serve as my initial demand for certain documents and information necessary to assist with my administration of this bankruptcy estate. Please arrange for copies of the following documents and information to be emailed to my office by January 31, 2023:

- 1. A list of all names used by the Debtor including AKAs and DBAs;
- 2. Bank statements and canceled checks for all accounts in the Debtor's name (individually or jointly) for the two-year period prior to the petition date;
- 3. Bank statements and relevant documents regarding the JPMorgan Chase Bank account reflected in the Statement of Financial Affairs, Question 23, evidencing that the account belongs to ASMG Consulting, Inc. or Ashna Shah;
- 4. Statements for all securities and/or retirement accounts in the Debtor's name (individually or jointly) for the two-year period prior to the petition date, including but not limited to the Debtor's TD Ameritrade account(s);
- 5. Credit card statements for all accounts in the Debtor's name (individually or jointly) for the two-year period prior to the petition date;

- 6. Images, inventory lists, estimated values, and appraisals (if any) for all of (a) the Debtor's paintings/art reflected on Schedule A/B, Question 8, including titles of the artwork and names of the corresponding artists, and (b) all artwork including but not limited to paintings, prints, and sculptures stored at Moishe's Moving System storage facility in Bronx, NY;
- 7. Images, inventory lists, estimated values, and appraisals (if any) for all designer clothing and jewelry listed in response to Schedule A/B, questions 11 and 12;
- 8. All documents reflecting the Debtor's interest in ASMG Consulting, Inc. including but not limited to the certificate of incorporation, articles of association, bylaws, etc.;
- 9. Bank statements and canceled checks for all accounts in ASMG Consulting Inc.'s name for the two-year period prior to the petition date;
- 10. Proof of income listed in response to Schedule I, Question 8(a);
- 11. All documents reflecting any interest/dividends the Debtor received in the two-year period prior to the filing date including amount(s) received and source of funds; and
- 12. Written description of Ashna Shah and Manish Shah's relationship to the Debtor and the events surrounding the Debtor's transfer of her ownership in ASMG Consulting, Inc. to Ashna Shah.

These requests are ongoing and may be further supplemented.

Please contact my proposed counsel, Jeannette Litos (ilitos@geronlegaladvisors.com). Thank you.

Sincerely yours,

Yann Geron

Yann Geron Chapter 7 Trustee

cc: Jeannette Litos, Esq. (by email) Nicole N. Santucci, Esq. (by email)